



In the Matter Of:

GIVE BACK, LLC.

VS

MOHAMED HADID, et al.

MOHAMED HADID

April 02, 2021

Case No: 20SMCV01315

CERTIFIED CONDENSED

GIVE BACK, LLC. vs MOHAMED HADID, et al.
Mohamed Hadid on 04/02/2021

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES-SANTA MONICA COURTHOUSE
(WEST DISTRICT)
3
4
5 GIVE BACK, LLC, a California Case No. 20SMCV01315
6 limited liability company,
7 Plaintiff,
8 vs.
9 MOHAMED HADID, an individual;
and DOES 1 through 50,
10 inclusive,
11 Defendants.

12
13 **CERTIFIED**
14 **CONDENSED**
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16
17
18 REMOTE VIDEO-RECORDED DEPOSITION OF MOHAMED HADID
19 FRIDAY, APRIL 2, 2021, 10:03 A.M.
20
21
22
23 Reported Stenographically and remotely by
24 Harry Alan Palter, Licensed California CSR No. 7708
25

1 APPEARANCES:
2 (PLEASE NOTE: APPEARANCES OF COUNSEL, THE WITNESS, AND
3 ANY OTHER ATTENDEES WERE MADE REMOTELY)
4 For Plaintiff:
5
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14 And
15
16 LAW OFFICES OF RONALD RICHARDS &
17 ASSOCIATES, A.P.C.
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25

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5 GIVE BACK, LLC, a California Case No. 20SMCV01315
6 limited liability company,
7 Plaintiff,
8 vs.
9 MOHAMED HADID, an individual;
and DOES 1 through 50,
10 inclusive,
11 Defendants.

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21 REMOTE VIDEO-RECORDED DEPOSITION OF MOHAMED HADID, a
22 witness herein, taken on behalf of the Plaintiff.
23 Commenced at 10:03 a.m. on Friday, April 2, 2021, before
24 Harry Alan Palter, California Certified Shorthand
25 Reporter, License No. 7708, reporting remotely.

1 APPEARANCES:
2
3 For Defendant:
4
5 LAW OFFICE OF RAYMOND JOHN BEKERIS
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13 Video Operator:
14
15 Jeffrey Lopez
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GIVE BACK, LLC. vs MOHAMED HADID, et al.
 Mohamed Hadid on 04/02/2021

1	INDEX		1	Friday, April 2, 2021; 10:03 a.m.
2		PAGE	2	
3	APPEARANCES	3	3	THE VIDEO OPERATOR: Good morning. Today
4	DEPOSITION SUPPORT INDEX	6	4	is April 2nd, 2021. The time is 10:03 A.M.
5	PROCEEDINGS	7	5	My name is Jeffrey Lopez with LitiCourt.
6			6	Today we are providing video services through remote
7	INDEX TO EXAMINATION		7	electronic means.
8			8	The case is Give Back, LLC, vs. Mohamed
9	WITNESS: MOHAMED HADID		9	Hadid. It is for the Superior Court of California,
10			10	County of Los Angeles, case number 20SMCV01315.
11	EXAMINATION OF:		11	We are contracted by the defense in this
12	Mohamed Hadid		12	matter, and today we are going to record the
13	BY MR. LONG	9	13	testimony of Mohamed Hadid.
14			14	We're going to take a moment to have
15	WITNESS DECLARATION	101	15	everyone present introduce themselves and state
16	ERRATA SHEET	102	16	their appearances for the record, after which time
17	REPORTER'S CERTIFICATE	103	17	the court reporter will swear in the witness, and we
18			18	will begin.
19	• _____ •		19	This is the beginning of media one,
20			20	day one. We are now on the record.
21			21	MR. LONG: Good morning. This is
22			22	Geoffrey Long, law offices of Geoffrey Long for the
23			23	plaintiff, Give Back, LLC.
24			24	(Certified stenographer clarification)
25			25	THE WITNESS: You can hear me right now;
		5		7
1	INDEX TO EXHIBITS		1	right?
2	MOHAMED HADID		2	THE CERTIFIED STENOGRAPHER: Off the
3	Give Back LLC vs. Mohamed Hadid		3	record.
4	Friday, April 2, 2021		4	MR. LONG: That's fine. We can go off
5	Harry Alan Palter, CSR No. 7708		5	the record.
6			6	THE VIDEO OPERATOR: We are off the
7	MARKED DESCRIPTION	PAGE	7	record at 10:05 A.M.
8			8	(Off the record)
9	(No Exhibits Offered)		9	THE VIDEO OPERATOR: We are back on the
10	• _____ •		10	record at 10:06 A.M.
11			11	THE CERTIFIED STENOGRAPHER: Mr. Bekeris?
12	DEPOSITION SUPPORT INDEX		12	MR. LONG: We need counsel and everybody
13			13	to identify themselves.
14	INFORMATION REQUESTED OF THE WITNESS:		14	MR. BEKERIS: Raymond Bekeris of the Law
15	Page 23, line 15		15	Firm of Bekeris is present on behalf of defendant
16	Page 89, line 16		16	Mohamed Hadid.
17			17	THE CERTIFIED STENOGRAPHER: Good
18	• _____ •		18	morning.
19			19	My name is Harry Palter, and I'm a
20			20	California Certified Shorthand Reporter with license
21			21	no. 7708.
22			22	The parties participating in this
23			23	deposition acknowledge that I will be
24			24	stenographically reporting this proceeding pursuant
25			25	to California Code of Civil Procedure Section No.
		6		8

<p>1 2025.310. 2 Additionally, following the deposition, 3 the transcript will be handled pursuant to the 4 California Code of Civil Procedure, Section 5 No. 2025.520. 6 7 MOHAMED HADID, 8 having been duly administered an oath in accordance 9 with the California Code of Civil Procedure Section 10 2094, and existing public health orders, was 11 examined and testified as follows: 12 13 EXAMINATION 14 BY MR. LONG: 15 Q Good morning, Mr. Hadid. As I indicated 16 prior to you taking the oath, my name is Geoff Long, 17 and I represent Give Back, LLC, in this lawsuit. 18 A Yes, sir. 19 Q Have you ever had your deposition taken 20 before? 21 A Yes, sir. 22 Q Okay. How many times? 23 A In the last 50 years, probably 20 or 25 24 times. 25 Q Okay. When was the last time you sat for</p>	<p>1 person, in any of the cases in 2 which the oath may, by law of 3 the State of California, be 4 administered, willfully and 5 contrary to the oath states as 6 true and material matter which 7 he or she knows to be false and 8 every person who testifies 9 declares, supposes, or 10 certifies under penalty of 11 perjury in any of the cases in 12 which the testimony, 13 declarations, depositions, or 14 certification is permitted by 15 law of the State of California 16 under penalty of perjury and 17 willfully states as true" any 18 matter -- "any material matter 19 which he or she knows to be 20 false is guilty of perjury." 21 I just want you to keep that definition 22 in mind as we proceed with this deposition. 23 You're in -- it looks like you're in a 24 conference room with your attorney? 25 A Yes, sir.</p>
<p>1 a deposition and you were the witness giving 2 testimony? 3 A I believe two years ago. 4 Q All right. So you are familiar with the 5 general procedure? 6 A Yes, sir. 7 Q Okay. I still want to go over some of 8 the basic ground rules so I have those on the 9 record. 10 The -- the oath that you just took is the 11 same oath as you would take as if you were 12 testifying in front of a judge or a jury and carries 13 with it the same force and effect and requires you 14 to tell the truth, the whole truth, and nothing but 15 the truth. Do you understand that? 16 A Yes, sir. 17 Q And for the record, I want to read in -- 18 I want you to understand the definition of 19 "perjury," which is provided under California Penal 20 Code section 118(a). And "perjury" is defined as: 21 "Every person who having 22 taken an oath that he or she 23 will testify declare, depose, 24 or certify truly before any 25 competent tribunal, officer, or</p>	<p>1 Q Are you at his office? 2 A No, sir. 3 Q What's the address that you're located at 4 right now? 5 A We are, right now, at 9650 Cedar Brook. 6 Q In which city? 7 A Beverly Hills, California. 8 Q And what is that? What location is that? 9 A That's just a -- an office that -- 10 MR. BEKERIS: Objection. It's vague. 11 It's a vague question. Objection. 12 BY MR. LONG: 13 Q You could go ahead and answer, if you 14 understand the question. Your attorney may object 15 during the deposition. And unless he instructs you 16 not to answer, if you understand the question, you 17 can go ahead and answer. 18 A I don't understand the question. I'll 19 give you the address. 20 Q So is this an office -- are you in an 21 office building? 22 A No, sir. 23 MR. BEKERIS: Objection. Asked and 24 answered. 25 ///</p>

1 BY MR. LONG:
2 **Q What -- what type -- is it a residence**
3 **you're at right now?**
4 A No, sir.
5 **Q What is it, if it's not a residence and**
6 **it's not an office building?**
7 A It's a construction -- it's a
8 construction site.
9 **Q Okay. Is there any -- what is being**
10 **constructed at that location?**
11 A What's being construct?
12 **Q Correct.**
13 A It's a project, sir. It's a construction
14 project.
15 **Q Of what? A hotel? An office? A home?**
16 **What is been constructed at that**
17 **location?**
18 MR. BEKERIS: Objection. Asked and
19 answered.
20 BY MR. LONG:
21 **Q You can go ahead and answer, sir.**
22 A It's a -- it's a construction of a home.
23 **Q Okay. What entity owns the real property**
24 **that you are located at right now? Or what person?**
25 A It's --

13

1 MR. BEKERIS: Objection. Compound.
2 BY MR. LONG:
3 **Q You can go ahead and answer.**
4 A It's just a -- it's a project for one of
5 the entities that -- that I am -- at this moment, we
6 are building a -- a residential home.
7 **Q What is the name of the entity that's**
8 **building -- that owns the real property that you're**
9 **located at?**
10 A I believe it's -- it's Tree Top, LLC.
11 **Q Are you a member of Tree Top, LLC?**
12 A I am, yes.
13 **Q Are you the only member of Tree Top, LLC?**
14 A No, sir.
15 **Q What percentage membership interest do**
16 **you have in Tree Top, LLC?**
17 A I'm not aware. I don't -- I don't
18 recall.
19 **Q Okay. I'm going to wait, because you**
20 **left the video.**
21 MR. LONG: We're going to wait until the
22 witness and his attorney have --
23 THE WITNESS: No, no. Hold on. Are you
24 back?
25 BY MR. LONG:

14

1 **Q Yes.**
2 A Somebody called me on the phone.
3 **Q Ah. Gotcha.**
4 A Sorry.
5 **Q No problem.**
6 A That's probably will happen few times
7 Friday.
8 **Q Sure.**
9 A It's an LLC that's -- it's owned by
10 several individuals. And I am -- I am a member as
11 well.
12 **Q Okay. Are you the manager of Tree Top,**
13 **LLC?**
14 A I am.
15 **Q Are you the only manager of Tree Top,**
16 **LLC?**
17 A Yes, I am.
18 **Q Okay. Are you under any medication or**
19 **substance today that would impair your ability to**
20 **give testimony?**
21 A I took a sleeping pill last night.
22 That's pretty much -- yeah. I'm fine.
23 **Q Okay. Is there any reason that you can't**
24 **give full, complete, and truthful testimony today?**
25 A I believe I can.

15

1 **Q Okay. Who are the other members of Tree**
2 **Top, LLC?**
3 A That's privacy that I can't talk to you
4 right now.
5 **Q Okay. What are you saying? It's**
6 **private?**
7 A Yes.
8 **Q And what is the basis -- okay. But if**
9 **your attorney doesn't instruct you not to answer,**
10 **you can go ahead and answer.**
11 **So who are the other members of Tree Top,**
12 **LLC?**
13 A As I said earlier, they are -- they are
14 individuals that I will not give their names at this
15 time.
16 **Q Okay. Do any of the other individuals**
17 **who are members of Tree Top, LLC, owe you any money?**
18 A No, sir.
19 **Q Have you made any loans to any of the**
20 **other members of Tree Top, LLC, in connection with**
21 **their membership?**
22 A No, sir.
23 **Q Do you owe any of the other members of**
24 **Tree Top, LLC, any money?**
25 A No, sir.

16

<p>1 Q Okay. I want to make sure you 2 understand -- and I want this to be clear for the 3 record -- that your deposition today is being taken 4 both pursuant to the general deposition statute 5 under the Code of Civil Procedure, 2025.010, et 6 seq., as well as under the Code of Civil Procedure, 7 485.230, to take asset discovery in connection with 8 the Writ of Attachment that's been issued against 9 you. Do you understand that? 10 A Yes. 11 MR. BEKERIS: Objection. Calls for a 12 legal conclusion. 13 BY MR. LONG: 14 Q You understand a Writ of Attachment has 15 been issued against you in this lawsuit; correct? 16 MR. BEKERIS: Objection. Calls for a 17 legal conclusion. 18 BY MR. LONG: 19 Q Sir, do you understand that there has 20 been a Writ of Attachment issued against you in this 21 lawsuit? 22 A Yes, sir. 23 Q Who did you -- did you meet with anyone, 24 other than your attorney, for purposes of your 25 deposition today?</p> <p style="text-align: right;">17</p>	<p>1 Q What is your job title with Casablanca 2 Heights? 3 A Development manager. 4 Q How much are you paid on a monthly basis 5 by Casablanca Heights? 6 A At this time, we are just in the process 7 of -- the project just kinda got off the ground. I 8 don't have -- I have not been paid yet. 9 Q What is the address -- the business 10 address of Casablanca Heights? 11 A I don't have that -- the exact address. 12 Q Do you have an -- do you have a written 13 agreement with Casablanca Heights? 14 A I do -- I have a -- I have a written 15 agreement, yes. 16 Q And do you know what the name of that 17 written agreement is? 18 A I don't have in front of me, sir. 19 Q Do you remember -- is it an employment 20 agreement? Is it -- let me strike that. 21 The written agreement you have with 22 Casablanca Heights, does it define your employment 23 and your step-up equity that you just mentioned? 24 MR. BEKERIS: Objection. Compound. 25 ///</p> <p style="text-align: right;">19</p>
<p>1 A No, sir. 2 Q Did you review any documents in 3 preparation for your deposition today? 4 A I did not. 5 Q Are you currently employed? 6 A I -- I'm employed by two entities in 7 Morocco and in Egypt. 8 Q Okay. What is the name of the entity in 9 Morocco that you are employed by? 10 A The entity is Casa -- Casablanca Heights. 11 Q Hold on here. 12 H-e-i-g-h-t-s? 13 A Yes, sir. 14 Q What type of entity is it? 15 A It's a construction -- construction and 16 development company that's building projects in -- 17 in Morocco. 18 Q What is your -- do you have a ownership 19 interest in Casablanca Heights? 20 A I would -- I will own an interest 21 eventually, if the project goes forward. And it's a 22 steppingstone -- step -- it's a step-up equity. 23 Q Okay. So, currently, you do not have 24 equity in Casablanca Heights? 25 A No, sir.</p> <p style="text-align: right;">18</p>	<p>1 BY MR. LONG: 2 Q You can answer. 3 A I -- I -- I do have it. There is such an 4 agreement, but I don't have it. I don't have it 5 with me here in the Los Angeles area. 6 Q How many agreements do you have with 7 Casablanca Heights? 8 A Just single agreement. Just two-page 9 agreement, actually. It's not -- it's not a 10 complicated agreement. 11 Q So you said you don't have it in the 12 Los Angeles area. Where is that agreement located? 13 A It's actually in Cairo. 14 Q Where in Cairo? 15 A Where in Cairo? At the offices of 16 Murchoudy Group. 17 Q Could you spell that for us. 18 A M-u-r-c-h-o-u-d-y. 19 Q And then you said it's Murchoudy Group? 20 A Yes. 21 Q What's the address of Murchoudy Group? 22 A I don't -- I don't know the exact 23 address. I will be more than happy to send it to 24 you. 25 Q It's in Cairo?</p> <p style="text-align: right;">20</p>

1 A It is in Cairo, yes.
2 **Q Are you an owner in Murchoudy Group?**
3 A No, sir, I'm not. I'm also a developer,
4 designer, so on. So we have a combination of the
5 jobs I'm doing for their projects.
6 **Q Well, so are you employed by Murchoudy**
7 **Group?**
8 A I am a -- I would say, yes, I am.
9 **Q What -- in what capacity are you employed**
10 **by Murchoudy Group?**
11 **In other words, what do you do for them?**
12 A Assisting in the development, in Cairo
13 and in the North Coast.
14 **Q North coast of what?**
15 A Of -- of Egypt.
16 **Q What is your monthly salary that you**
17 **receive from Murchoudy Group?**
18 A I haven't -- I don't work on salary.
19 What I do is, I work on a -- I work on the project
20 and eventually, they will -- I will get a -- a
21 percentage of the upside.
22 **Q So is it --**
23 (Certified stenographer clarification)
24 **THE WITNESS:** Normally what I do in these
25 projects, they provide all the equity. They provide

21

1 the land. I help them with the development, and
2 then I get -- when the project is all done, I get a
3 percentage of the -- of the project itself or
4 profit-sharing.
5 BY MR. LONG:
6 **Q Do you know for Murchoudy Group what**
7 **percentage of equity you are going to receive if the**
8 **development is completed?**
9 A Well, it's -- again, it's a -- it's a
10 four-prong project. So it has a -- it's four
11 towers. And then they are completely all in one at
12 one time. And then I will -- I'll have a
13 4.5 percent interest in it eventually.
14 **Q Do you have a written agreement with**
15 **Murchoudy Group?**
16 A I do, yeah.
17 **Q And is that document also located in --**
18 **at the Cairo office?**
19 A Yes.
20 **Q At the Cairo office of Murchoudy Group?**
21 A That's where I -- that's where I --
22 that's my office at this time.
23 **Q Okay. So all -- so that -- now you have**
24 **an office at that location?**
25 A Yes, sir.

22

1 **Q And you don't know the address of it,**
2 **though -- where the office is?**
3 A They pick me up from the airport. I go
4 there -- I can find out. But I -- I really don't --
5 I don't recall the exact address. I just -- I don't
6 walk to it. It's not walking distance.
7 **Q Okay. I'm going to request --**
8 A In Katameya. I -- I will send you an
9 address.
10 **Q I'm going to ask that the court reporter**
11 **leave a blank here, and you can fill in the address**
12 **when you're able to obtain it. That will be**
13 **wonderful. Thank you.**
14 A Yes, sir.
15 (INFORMATION REQUESTED:
16 _____
17 _____
18 _____
19 _____
20 _____)
21 BY MR. LONG:
22 **Q Going back to Casablanca Heights, is it**
23 **you personally, Mohamed Hadid that has the written**
24 **agreement or one of your entities?**
25 A It's an entity, sir.

23

1 **Q Which entity?**
2 A It's a Casablanca project development
3 corporation. It's a -- it's a -- it's a -- a --
4 it's a Moroccan -- it's a Moroccan entity. Means
5 it's -- what they call "System of Morocco."
6 **Q And are you the sole shareholder of --**
7 **was it -- I'm sorry. Casablanca Project Development**
8 **Corporation? Is that what it's called?**
9 A Yes, sir.
10 **Q Are you the sole shareholder?**
11 A Yes, I am.
12 **Q And then the agreement you have with**
13 **Murchoudy Group, is this agreement with you**
14 **personally or by one of your entities?**
15 A Yes. Entity.
16 **Q Which entity?**
17 A It was -- if I remember, it was -- I'll
18 get back to you on that, please. I don't want to
19 give you a -- it was a -- it's an Arabic name. I'll
20 get back to you on that, sir.
21 **Q That entity that has the agreement with**
22 **Murchoudy Group, are you the sole owner of that**
23 **entity?**
24 A Yes, sir, I am.
25 **Q Okay. Other than the -- the work that**

24

1 you're doing with Casablanca Heights and Murchoudy
2 Group, do you have any other current employment?
3 MR. BEKERIS: Objection. Calls for a
4 narrative.
5 BY MR. LONG:
6 Q You can go ahead and answer.
7 A No, sir, I don't. No.
8 Q Where do you currently reside?
9 A At -- in Katameya 8 in Egypt. In Cairo.
10 North. It's the New Cairo. Katameya, it's a
11 development project that I am -- it's number 8.
12 Q Can you give me the address of that
13 location where you reside in Cairo, Egypt?
14 A 8 Katameya.
15 Q Can you spell that, please.
16 A K-a-t-a-m-i-a -- e-i-a [sic].
17 Q Okay. Continue. 8 Katameya.
18 A Number 8, Katameya, Cairo. And there's a
19 ZIP code -- I don't -- I don't have -- similar like
20 a ZIP code. I don't know. I don't have that.
21 Q So is Katameya the street name?
22 A No. Katameya is the -- is the
23 development. It's a -- it's a development
24 outside -- just in -- in the New Cairo.
25 Q So there is no street name? It the just

25

1 8 Katameya?
2 A Yes, sir. It's like Beverly Park. It's
3 like that kinda thing. There's 50 or 60 homes, and
4 number 8 is number 8, and that's -- Katameya is like
5 a development in -- in -- in -- in New Cairo.
6 Q Okay. So if you wanted to have someone
7 send you a letter to your residence in Cairo, you'd
8 give them that address, 8 Katameya Cairo, and the
9 letter would get to you?
10 A I hope so.
11 Q Okay. Do you own that residence?
12 A No, sir.
13 Q Do you rent it?
14 A No.
15 Q Do you lease it?
16 A No. It's given to me to use by -- by the
17 Murchoudy Group. It's owned by the Murchoudy Group.
18 Q And to confirm again -- I believe I asked
19 you -- but you don't have any ownership interest in
20 the Murchoudy Group?
21 A No, sir. Not at all. Murchoudy Group is
22 a huge company, sir. It's not a -- and it's been
23 around for, I think, 50 or 60 years.
24 Q When you are in Los Angeles, where do you
25 stay?

26

1 A At my kids' compound.
2 Actually, I stay at a cottage at my kids'
3 compound.
4 Q One of your daughters' compound?
5 A Yes.
6 Q Is that in Coldwater Canyon?
7 A Sir, I really can't give you any
8 information on that. I think I have -- as you know,
9 I'm sure that yourself and -- there's a little
10 privacy for -- on my kids to use their name both
11 time.
12 And I don't -- I don't really want to
13 give you information on that. That's where -- where
14 they live, and I don't think it's -- I don't
15 think it's published for us -- but I also -- you
16 know, I worry about their safety.
17 Q Okay. Let me ask you this: You're
18 telling me that one of your daughters -- is this a
19 residence that is owned by one of your daughters?
20 A It's owned by family, yes. One or --
21 actually, it's owned by two of my daughters.
22 Q Okay. And do they -- they reside there
23 as well?
24 A They reside mostly in -- in other places.
25 Q Okay. So this compound that you're

27

1 saying is your daughter's real property -- real
2 estate, is that located at 1299 Monte Cielo in
3 Beverly Hills?
4 A What?
5 Q Do you know an address, 1299 Monte Cielo,
6 C-i-e-l-o, in Beverly Hills?
7 A Never heard of it.
8 Q Are you familiar with an address at
9 1701 Coldwater Canyon in Beverly Hills?
10 A What -- 1 what?
11 Q 1701 Coldwater Canyon in Beverly Hills.
12 A Never heard of it.
13 Q Okay. Well, sir, where do you -- when
14 you come to Los Angeles, do you ever have mail sent
15 to you in Los Angeles?
16 A Well, I don't -- I don't come here often
17 anymore. But I used to come to other places that I
18 never -- I never received them. They used to go to
19 my old address, which is on 630 Nimes Road. Now,
20 they go to our -- there's an office we have here in
21 Los Angeles.
22 Q What's that office location?
23 A It's on Wilshire Boulevard.
24 Q Can you give me the address, please.
25 A I can -- may I give it to you --

28

1 truthfully, I don't -- I know you think that I'm --
2 I just don't have exact number. I know it's on
3 Wilshire and Beverly, and I'll give you the address
4 this afternoon when we continue this conversation.
5 I'll find it, and I'll give it to you. Anything you
6 want, you can send there, and it arrives to me.
7 **Q Who is located at the address -- did you**
8 **ever have an office or location at 11301 Olympic**
9 **Boulevard, Suite 537, in Los Angeles?**
10 A That's just -- yeah. That's a --
11 still -- that's still there. It's a -- but it's a
12 mail -- mailbox address.
13 **Q 'Cause I'll represent to you, certain of**
14 **your entities have registered with the California**
15 **Secretary of State with that entity address.**
16 A Yes, sir. That's correct.
17 **Q Okay. You receive mail at that address?**
18 A Yes, sir.
19 **Q Okay. And you're telling me that when**
20 **you stay in L.A., you typically will stay with one**
21 **of your daughters; is that right?**
22 A Correct.
23 **Q Okay. And that you have no personal**
24 **residence in Los Angeles County?**
25 A At this time, no, sir.

29

1 **Q That's a correct statement? You have no**
2 **personal residence address in Los Angeles County at**
3 **this time?**
4 A "No."
5 MR. BEKERIS: Objection. Asked and
6 answered.
7 BY MR. LONG:
8 **Q Is that correct?**
9 A That's correct.
10 **Q And sometimes I might re-ask a question**
11 **because we get a double-negative. So that's why I**
12 **might ask it. I'm not trying to confuse you or**
13 **harass you. I just want you to know that.**
14 **And it's your testimony, to be clear, you**
15 **are not familiar with an address of 1299 Monte Cielo**
16 **in Beverly Hills?**
17 A I have never -- I don't even know what it
18 is. I don't even know where that area is.
19 MR. BEKERIS: I'm going to object again.
20 Asked and answered.
21 BY MR. LONG:
22 **Q And the same thing for the address at**
23 **1701 Coldwater Canyon. You don't know that address;**
24 **correct?**
25 A No, sir. Never heard of it.

30

1 **Q Okay.**
2 MR. BEKERIS: I'm going to object again.
3 Asked and answered.
4 BY MR. LONG:
5 **Q Sir, what are your current sources of**
6 **income personally?**
7 A Well, it was -- I used to get some
8 development -- when the projects were going on, on
9 Cedar Brook and Summit Ridge, we have project.
10 There and since COVID and the -- since COVID and
11 the -- the rainy season started on hillside, we
12 stopped -- we got stopped funding -- funding was
13 stopped because the members were underwater. And,
14 therefore -- so for almost now eight, nine, ten
15 months, whatever, the income stopped. I used to get
16 some development -- development fees. Now we have
17 not as of -- as of that.
18 **Q What was the -- there was Cedar Ridge.**
19 **What was the other development you mentioned?**
20 A Summit Ridge, sir.
21 **Q Cedar Ridge and Summit Ridge?**
22 A Cedar Brook and Summit Ridge.
23 **Q Thank you. I'm sorry.**
24 **What entity owned Cedar Brook?**
25 A I answered that earlier, sir. Tree Top.

31

1 **Q Oh, that's Tree Top. Okay.**
2 **What entity Summit Ridge?**
3 A Tree Lane.
4 **Q Tree Lime?**
5 A Tree Lane.
6 **Q Tree Lane.**
7 A Yes, sir.
8 **Q Are you a member of Tree Lane?**
9 A Yes, I am.
10 **Q Is that a California LLC?**
11 A Yes, sir.
12 **Q What is your membership percentage in**
13 **Tree Lane, LLC?**
14 A Oh, God. It's been -- you know, since
15 then, it has been doing -- I -- I don't even know if
16 I -- I don't recall. I am a member, though.
17 **Q Are you the manager of Tree Lane, LLC?**
18 A Yes, I am.
19 **Q And I don't think I asked you, but Tree**
20 **Top, LLC, that's also a California LLC; correct?**
21 A Yes, sir. Yes, it is.
22 **Q Do you know an individual by the name of**
23 **Fernando Szew, S-z-e-w?**
24 A Never met -- never -- never -- never
25 met -- never heard of anybody with that name.

32

1 Q What about the name Nadina Szew?
2 And that's N-a-d-i-n-a; last name,
3 S-z-e-w.
4 A Never heard of it. I -- I don't know who
5 these people are.
6 Q Okay. What make of automobile do you
7 drive when you're in Los Angeles?
8 A At this time, I'm driving a leased G
9 Wagon. And I have a Rolls-Royce. And then I just
10 turned it in, actually. My lease was up. And it
11 was turned on -- turned in about a week ago.
12 Q Whose name is on the lease of the G
13 Wagon? Who's the lessee?
14 A Truthfully, I don't know. Other -- it's
15 an LLC or a corporation or a person. I don't really
16 get involved in these things.
17 Q Well, who pays for that lease?
18 A It's paid at this time by -- it was -- by
19 Murchoudy Group.
20 Q Is it still being paid by -- the lease on
21 the G Wagon is --
22 A The G Wagon is -- is paid by -- yes, by
23 Murchoudy Group.
24 THE CERTIFIED STENOGRAPHER: Try to speak
25 one at a time, please.

33

1 THE WITNESS: Sorry. Say again.
2 THE CERTIFIED STENOGRAPHER: I said --
3 this is the reporter. Try to speak one at a time,
4 please.
5 THE WITNESS: Oh.
6 THE CERTIFIED STENOGRAPHER: Thank you.
7 BY MR. LONG:
8 Q So another one of the rules of the
9 deposition that really helps the court reporter's
10 job is if we only speak one at a time. You allow me
11 to finish my question, and then when you answer,
12 I'll make sure that I give you time to finish your
13 answer. That way, he -- when he types it up, we
14 have a clear transcript of the question and an
15 answer?
16 Also, the court reporter can obviously
17 only take down one person at a time; okay?
18 A Okay. Thank you.
19 Q Sometimes I do the same thing, and we
20 just need to remember to slow down.
21 A Okay.
22 MR. BEKERIS: Do you need a break?
23 MR. LONG: No. Do you?
24 MR. BEKERIS: I was just wondering why
25 the long pause. Sorry.

34

1 BY MR. LONG:
2 Q Sir, do you have a California Driver's
3 License?
4 A I do, sir, yes. And I have --
5 (Certified stenographer clarification)
6 THE WITNESS: I have California Driver's
7 License. When I am in Egypt or in -- or other
8 countries, I have an international driver's license.
9 Means you -- you have to take -- in Cairo, for
10 example, if you are staying there more than certain
11 time, you have to get a driver license in Egypt to
12 be able to drive -- if you are there more than six
13 months.
14 BY MR. LONG:
15 Q Do you have a California Driver's
16 License?
17 A I do, sir, yes.
18 Q Do you have it with you?
19 A No, sir.
20 Q Do you have -- you don't have your wallet
21 with you?
22 A No, sir.
23 Q Where is your wallet right now?
24 A In my car.
25 Q You drove your car to the location you're

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1 at right now?
2 A Yes, sir.
3 Q Okay. Why don't we take a break. We'll
4 go off the record, and I'm going to let you go get
5 your wallet. So we'll go off the record, and then
6 I'd like you to please go grab your wallet.
7 THE VIDEO OPERATOR: Does everyone agree
8 to go off?
9 MR. BEKERIS: Um -- oh, so, okay. We'll
10 -- we'll go off the record.
11 MR. LONG: Okay. Let's go off the
12 record.
13 MR. BEKERIS: This is Raymond Bekeris on
14 behalf of defendant Mohamed Hadid agreeing to go off
15 the record at the plaintiff's request.
16 THE VIDEO OPERATOR: We are off the
17 record at 10:41 A.M.
18 (Off the record)
19 THE VIDEO OPERATOR: We are back on the
20 record at 10:44 A.M.
21 THE WITNESS: Yes, sir.
22 BY MR. LONG:
23 Q Okay. Mr. Hadid, could you please give
24 me your California Driver's License number?
25 A No, sir.

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1 **Q Why not?**
2 A 'Cause that's a -- my -- it's -- it's
3 a -- it's like a -- giving you my Social Security
4 number on -- on the phone. I thought you wanted to
5 get some, like, address or something, but -- or when
6 it's expired. But I'm not going to give you my --
7 that's definitely a private matter that no one does
8 in any -- in any condition.
9 **Q Okay. So you're refusing to provide your**
10 **California Driver's License number?**
11 A Privacy. Yes. Absolutely.
12 It's really not privacy. It's a -- it's
13 a security for my -- for my credit and so on and so
14 forth. Yes. I will not give to you.
15 **Q Okay. I want to, again, remind you that**
16 **this deposition is being taken pursuant to the Writ**
17 **of Attachment that's been issued against you.**
18 **What address is on your Driver's --**
19 **California Driver's License number?**
20 A It's 11301 West Olympic Boulevard, 537,
21 Los Angeles, California.
22 MR. BEKERIS: I'd like to go on the
23 record with a -- with an -- an objection. We -- in
24 the beginning of the deposition, we listened to --
25 so I've done 100 depositions, and I've never heard

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1 anybody read the entire Penal Code on perjury. And
2 you -- you mentioned it a few more times, and you're
3 continuing to do it, so I'm objecting to that.
4 MR. LONG: Counsel, you've done
5 100 depositions, and you've been a lawyer for two
6 years?
7 THE WITNESS: Excuse me. We're not
8 talking about him. Let's -- let's continue with --
9 MR. LONG: Well, no. Sir, allow me to
10 please take my deposition. Your counsel has engaged
11 in a discussion, and I'm asking -- I'm asking -- you
12 just made a representation on the record that he's
13 had 100 depositions, and that he's never heard
14 anyone give the definition of "perjury."
15 THE WITNESS: My -- my -- my attorney is
16 not taking the deposition. I am. So if you
17 continue -- let's move on.
18 MR. LONG: I want to go back to this
19 address at --
20 MR. BEKERIS: Excuse me. Excuse me,
21 Counsel. Counsel, this is Raymond Bekeris on behalf
22 of Mohamed Hadid. You have asked -- you -- you have
23 challenged my character, I believe, on the record
24 here; is that correct?
25 MR. LONG: We're continuing the

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1 deposition now. Do you have an objection, or do you
2 have something to say?
3 MR. BEKERIS: This is not my deposition.
4 You don't ask me questions. You ask Mr. Hadid
5 questions, please, if that's possible. We want to
6 get through this as pleasantly and politely and
7 cooperative as possible. And I've made a point that
8 you keep bringing up --
9 THE WITNESS: Let's -- let's keep it this
10 way, because I'm -- I'm -- I am -- hopefully we can
11 get this amicably and work through all this stuff
12 without having to have fight through attorneys.
13 Thank you, sir. Let's go ahead.
14 BY MR. LONG:
15 **Q Sure.**
16 **The reason I'm kinda going back to this**
17 **is, we have reason to believe that when you are in**
18 **Los Angeles, you stay at a residence that is on**
19 **Monte Cielo and Coldwater Canyon. And I just want**
20 **to make sure. I don't want you to be confused that**
21 **you don't know that location.**
22 A I -- sir, sir. With utmost respect to
23 you and to all the people around you, one is, I have
24 never even heard of that name. I have never seen
25 that house, if it's a house or -- or whatever it is.

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1 I have never even heard of it. So you keep coming
2 back to this address and these names you come up
3 with. I have no idea who these people are.
4 I mean, we are -- you and Give Back and
5 the people behind Give Back -- the gentleman that
6 owns Give Back -- I -- they all know me. They know
7 I have never lived in my -- in this address. They
8 know me very well. The only address I've had here
9 in Los Angeles, last one was when I sold -- the last
10 house, which is on Nimes -- 630 Nimes, that was
11 about 2 1/2 years ago. So I -- I -- I assure you
12 that I don't live at that address, and I have never
13 been to that address. And you can bring ten people
14 that -- that -- that would know that I don't live at
15 this address.
16 So, sir, let's get off that subject,
17 because I was not. And I have never been, and
18 nobody -- not in my family or anyone else ever lived
19 at that address.
20 **Q Okay. Thank you for that answer. I**
21 **appreciate it.**
22 A Okay. Yeah.
23 **Q Where -- what -- where do you -- do you**
24 **pay any rent, personally, or any lease payments,**
25 **personally, for any real estate in California?**

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1 A No, sir.
2 **Q With what bank do you bank in California?**
3 A I don't.
4 **Q You don't have a bank account in**
5 **California?**
6 A I do not, sir, no.
7 **Q Do you have a bank account in the United**
8 **States?**
9 A No, sir.
10 **Q Where do you have -- do you have -- do**
11 **you have a bank account anywhere?**
12 A Most of my bills are paid by the groups
13 out of -- Murchoudy Groups [sic] and the Casablanca
14 Group.
15 **Q So let me ask: When you need -- when**
16 **you're in L.A. and you need cash, how do you get**
17 **cash?**
18 A It's -- cash is -- I have a card that --
19 it's from Egypt that I can cash if I need \$10,000,
20 \$5,000, or whatever, I can -- I can -- I can get
21 that.
22 **Q So is that card in your wallet?**
23 A No, it's not.
24 **Q Okay. Do you have any -- any credit**
25 **card -- strike that.**

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1 **Do you have a debit card in your wallet?**
2 A I don't -- I don't have any credit cards
3 on me at this time -- any -- neither in my wallet or
4 in the car. No, I don't.
5 **Q Okay. So you said if you needed money,**
6 **though, you could get it because you have a card.**
7 **And I'm paraphrasing. I know that's not exactly**
8 **what you said, but where is that card that you were**
9 **referring to?**
10 A I have it at the cottage. I came for
11 deposition. I didn't come for lunch.
12 **Q Well, you have expenses while you're**
13 **here.**
14 **How long are you in Los Angeles right**
15 **now? When did you arrive?**
16 A I came back five days ago.
17 **Q And when do you plan on leaving**
18 **Los Angeles?**
19 A You know, as -- as quick as I can. I'm
20 not here for -- I -- I don't have much to do here
21 right now.
22 **Q So are you familiar with the loan that is**
23 **the underlying subject of this litigation from**
24 **Romspen California Mortgage Limited Partnership to**
25 **Coldwater Development, LLC, and Lydda LUD, LLC?**

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1 **You're familiar with that loan?**
2 A Well, I can't say that I'm -- I've not --
3 I know of it. Yes, of course.
4 **Q And that's all I'm asking right now. I'm**
5 **not asking you any other specifics.**
6 **You're familiar generally?**
7 A Yes, I am aware of it, sir.
8 **Q Okay. And the -- that loan was a**
9 **construction loan; correct?**
10 A No, sir.
11 **Q What kind of loan was it?**
12 A It was a financing of land with interest
13 reserve, and the -- there was some money left in the
14 loan for permitting and construction of the first
15 phase of the road.
16 **Q And you said the financing of the**
17 **purchase of the land. What land -- what do you call**
18 **that land? What name do you give it?**
19 A It's not purchasing. It's a refinancing.
20 It's a refinance.
21 **Q Okay. What name --**
22 A Not purchasing.
23 **Q -- do you call that?**
24 A Call that?
25 **Q What name do you call the land?**

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1 A Oh. It's a Royal -- we call it "Royalton
2 Project."
3 **Q "Royalton"?**
4 A Yes.
5 **Q Okay. Are there property taxes currently**
6 **owed on Royalton Project?**
7 A I believe there is, yes, sir.
8 **Q Okay. And do you -- have you spoken to**
9 **any lenders about the payment of those property**
10 **taxes?**
11 A Yes, sir.
12 **Q Okay. Which lenders?**
13 A Are you talking about, like, lenders that
14 might lend me money to pay these taxes? Is that
15 what you're saying?
16 **Q Correct.**
17 A I asked -- I asked my -- my friends in
18 Cairo to advance me some funds to take care of this
19 outstanding bills. Yes, sir.
20 **Q Which friends in Cairo?**
21 A They -- Murchoudy Group.
22 **Q What did they say of your request?**
23 A They said they'll be happy to do so.
24 **Q Have you discussed any -- is there going**
25 **to be a loan?**

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1 A It's going to be a -- a -- well, it will
2 be -- it will be a loan paid out eventually, but I
3 can't -- I call "advancement"; you call it "a loan."
4 I'm not sure exactly. It's the same thing, except
5 one without carrying any interest on.
6 **Q What is the amount of the -- that**
7 **advancement that you discussed with Murchoudy Group**
8 **to pay the property taxes on the Royalton Project**
9 **property?**
10 A I can't recall that. There was a --
11 approximately, total combination of the previous
12 taxes and future taxes in the next few months or
13 something. It's approximately 57,000 -- or 63,000.
14 Something like that. In that area. It will be paid
15 on time.
16 **Q In connection with the loan from Romspen**
17 **to Coldwater Development, LLC, and Lydda LUD, LLC,**
18 **there was a Promissory Note; correct?**
19 A You know --
20 MR. BEKERIS: Objection. Calls for a
21 legal conclusion.
22 THE WITNESS: I -- I --
23 BY MR. LONG:
24 **Q Hold on, sir. I want to -- I want to**
25 **meet and confer with your counsel.**

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1 A Yes, there is.
2 **Q Okay. And in connection with the loan**
3 **from Romspen to Coldwater Development and Lydda LUD,**
4 **there was also a Loan Agreement; correct?**
5 A I believe so.
6 **Q Okay. Now, you responded to requests for**
7 **admissions that were served in this litigation and**
8 **you denied that Coldwater Development, LLC, is in**
9 **default on the Promissory Note. Do you --**
10 MR. BEKERIS: Objection.
11 MR. LONG: I haven't asked the question
12 yet.
13 MR. BEKERIS: Okay. Okay. Objection.
14 Misstates his testimony.
15 BY MR. LONG:
16 **Q Sir, do you deny -- actually, let me ask**
17 **you this way: Do you admit that Coldwater**
18 **Development, LLC, is in default on the Promissory**
19 **Note with Romspen?**
20 MR. BEKERIS: Objection. Calls for a
21 legal conclusion.
22 BY MR. LONG:
23 **Q You can answer.**
24 A I -- I really can't -- I can't tell you
25 there is -- it's not -- I believe it's not. It's

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1 MR. LONG: Counsel, you're telling me
2 that the individual who signed the Promissory Note
3 for me to ask him if there is a Promissory Note
4 calls for a legal conclusion?
5 MR. BEKERIS: I'm not sure of your
6 question. You were asking him about the -- the --
7 the purpose of the contract that he signed -- what
8 the words meant, what -- you know -- you're getting
9 into some details on the -- on the contract, and I
10 just don't want him to try -- I don't want you to
11 ask him questions that call for a legal conclusions.
12 MR. LONG: Well, okay.
13 Can I have the question read back?
14 THE CERTIFIED STENOGRAPHER: Yes.
15 (Record read by the Certified
16 Stenographer as follows:)
17 "QUESTION: In connection
18 with the loan from Romspen to
19 Coldwater Development, LLC, and
20 Lydda LUD, LLC, there was a
21 Promissory Note; correct?"
22 BY MR. LONG:
23 **Q Is that correct, sir?**
24 A Are you asking me?
25 **Q Yes.**

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1 not in default, because there is other reasons why
2 it should not be in default. So that's -- that's
3 a -- that will come up in the next -- in the -- in
4 the next legal -- legal argument that would be set
5 forth in the future.
6 **Q Okay. So what are your reasons for**
7 **believing it's not in default?**
8 MR. BEKERIS: Objection. Calls for a
9 legal conclusion.
10 BY MR. LONG:
11 **Q You can answer.**
12 A I -- I am not going to give you a
13 legal -- a legal argument here. I believe it's not.
14 And then I will -- that -- we will have to -- we'll
15 decide -- would be decided in court.
16 **Q Okay. So I'm entitled to your testimony**
17 **here today as to the beliefs -- as to the**
18 **enforceability of the contracts that are in issue in**
19 **this litigation. You just said you have a belief**
20 **that it's not in default. I want to know the basis**
21 **of that belief.**
22 A I can't give you the basis right now. We
23 have -- we are working on the basis of the default
24 as we speak, and then we'll -- as soon as you will
25 see it in papers.

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1 MR. BEKERIS: Objection. To the extent
2 that any part of that answer may involve discussions
3 that he had with counsel, I would ask him not to
4 discuss those with you.
5 MR. LONG: Okay.
6 BY MR. LONG:
7 **Q And I just want to give you one more**
8 **chance, because we're here today so I can learn**
9 **your -- the facts and your beliefs as to whether or**
10 **not there's been a default and other issues in this**
11 **litigation. And if you don't -- if I don't get**
12 **answers now, we'll bring you back for another**
13 **deposition most likely.**
14 **I just want to be clear. You are not --**
15 **you're refuse -- you're not going to tell me right**
16 **now the basis of your belief that Coldwater**
17 **Development, LLC, is not in default of the**
18 **Promissory Note with Romspen?**
19 A Yeah. I don't believe we are.
20 **Q And are you going to tell me the basis of**
21 **your beliefs that you aren't in default?**
22 A We -- we -- my -- I have -- I have --
23 legal counsel will be -- will be discussing the --
24 the next issues in the future. And I'm sure you
25 will be receiving -- you and the other group -- you

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1 are the lawyer -- and the -- and the owner of the --
2 any of Give Back. You will receive something from
3 us for sure why we are not in default.
4 **Q Okay. And I want to just close this**
5 **issue -- you have no personal knowledge of any facts**
6 **to support your belief that Coldwater Development,**
7 **LLC, is not in default of the Promissory Note with**
8 **Romspen. Is that what you're saying?**
9 A Sir, I'm not going to answer that
10 question. I think we -- we have talked several
11 times -- I -- I don't believe that -- that we have a
12 basis that we know that we are in -- not in default.
13 Actually, the opposite. We are in default.
14 **Q And I'm asking you right now: Can you**
15 **tell me any of the facts that you have personal**
16 **knowledge of --**
17 A I --
18 **Q -- that Coldwater -- please let me finish**
19 **my question.**
20 **Sir, can you give me -- do you have a**
21 **personal knowledge of any of the facts supporting**
22 **your beliefs that Coldwater Development, LLC, is not**
23 **in default of its Promissory Note with Romspen?**
24 MR. BEKERIS: Objection. This is the --
25 almost the tenth time you asked the same question.

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1 He's given you an answer. Asked and answered.
2 MR. LONG: Sir, again, I haven't asked
3 this exact question. I'm giving your client one
4 more opportunity to tell me whether or not he has
5 personal knowledge of those facts.
6 BY MR. LONG:
7 **Q Sir, do you have any personal knowledge**
8 **of those facts?**
9 A My personal knowledge is -- has to do
10 with the legal conclusion from my legal team that --
11 that we have. And I'm -- I cannot give you the -- I
12 can't give you at this moment my -- the answer to
13 that question.
14 **Q Okay, sir. Do you believe that Coldwater**
15 **Development, LLC, is in default of the Loan**
16 **Agreement with Romspen?**
17 A No.
18 MR. BEKERIS: Objection. You're asking
19 the same question just in a different way.
20 MR. LONG: Actually, Counsel, I'm not.
21 If you listen more carefully, now I'm asking about
22 the Loan Agreement, not the Promissory Note. This
23 deposition is going to take a long time if you don't
24 listen carefully.
25 THE WITNESS: We have --

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1 MR. BEKERIS: Objection. Counsel, you're
2 asking the same question in a different way.
3 BY MR. LONG:
4 **Q Sir, let me ask you this -- Mr. Hadid --**
5 **we'll do this the real roundabout long way just to**
6 **get -- is there a Loan Agreement separate from the**
7 **Promissory Note in connection with the loan from**
8 **Coldwater Development LLC and Lydda LUD, LLC?**
9 A There's a responsibility between the
10 Coldwater and Romspen Coldwater -- there's two --
11 they have certain responsibility toward Coldwater
12 and Coldwater has responsibility toward -- so I
13 believe that in my -- in what we will show to the
14 courts in the future, that there is a -- there is
15 a -- there is a default in my opinion of -- of
16 Romspen to Coldwater. So we will show that in the
17 future and the time will come.
18 At this moment, I'm not going to give
19 that you conclusion because it's not -- it's not the
20 time. This is a deposition. You can ask me
21 anything you want, and I can either answer it or
22 not. And I will -- I am answering it as good as I
23 can.
24 As again, I'm trying to be -- I'm trying
25 to be as -- as honest -- as honest and I will not

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1 say something that it's different than what I say it
2 in public. I -- of course, I don't -- I'm not -- I
3 don't go out to newspapers and New York Times and
4 speak ill of the -- of Romspen or -- or the people
5 who brought the north from Romspen.
6 I'm here just to discuss this, and
7 hopefully one day welcome to a -- a settlement where
8 we will pay our dues, and Romspen will pay their
9 dues, and other people hopefully will come to some
10 other agreement. So whatever it is, we will -- we
11 are -- I'm here to -- part of it is to eventually
12 have everyone whole and happy and move on with our
13 lives. That's it.
14 **Q Okay. I --**
15 MR. BEKERIS: I'm going to add to that,
16 also, this is another question asking for a legal
17 conclusion, as well.
18 MR. LONG: I'm going to move to strike
19 the response as nonresponsive.
20 BY MR. LONG:
21 **Q Sir, all I asked you is: In connection**
22 **with the loan from Romspen to Coldwater Development,**
23 **LLC, and Lydda LUD, LLC, there was both a Promissory**
24 **Note and a Loan Agreement; correct?**
25 MR. BEKERIS: Objection. Compound.

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1 THE WITNESS: And responsibilities.
2 BY MR. LONG:
3 **Q I'm --**
4 A Excuse me, sir. There is -- yes. There
5 is both of these but also there is responsibility on
6 both sides what to do to keep -- to say that this
7 agreements have to be -- has to be -- they have to
8 be acted on by both parties.
9 **Q Sir, again, this is going to be -- if you**
10 **just listen to my question. I'm not denying there's**
11 **response of both sides of the contract. All I'm**
12 **trying to do right now is -- your attorney objected**
13 **that I was asking the same questions, but I wasn't,**
14 **because I'm talking about a separate contract now.**
15 **So all I'm trying to establish is really**
16 **simple. If this goes this way, we're going to be**
17 **here -- it's going to be a really long day.**
18 **But all I'm trying to establish right now**
19 **is: There are two contracts, at least: A**
20 **Promissory Note and a Loan Agreement; correct?**
21 MR. BEKERIS: Asked and answered. And
22 it's a compound question.
23 MR. LONG: Can you explain to me how
24 that's compound, Counsel.
25 THE WITNESS: Okay. Is there -- was

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1 there a -- a note? Yes.
2 BY MR. LONG:
3 **Q Go ahead. Sorry.**
4 A You said -- you said there was two:
5 There's a Promissory Note, and there was a -- a Loan
6 Agreement; right?
7 **Q Yeah. Is that right?**
8 A That's correct.
9 **Q Okay. Great. Great.**
10 **And I want to just caution you, because**
11 **the reason I'm asking these questions about what**
12 **facts you have personal knowledge of regarding**
13 **whether or not Coldwater and Lydda LUD are in**
14 **default because later on, I'm just giving you -- I'm**
15 **just letting you know. I want to put my cards out**
16 **there. Later on if you sign a Declaration saying**
17 **you have knowledge of facts regarding that there was**
18 **no default, we're going to move to object, we're**
19 **going to object, and move to strike it. Because**
20 **right now, you're refusing to tell me any facts, and**
21 **you are not giving me -- you're saying you don't**
22 **have personal knowledge.**
23 **So I'm letting you know right now why I'm**
24 **asking these questions. I don't want to play games;**
25 **okay?**

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1 **So my question is: Do you -- is it your**
2 **position that Coldwater Development and Lydda LUD**
3 **are not in default with the Loan Agreement with**
4 **Romspen? Is that your position?**
5 MR. BEKERIS: Objection. That's about
6 the 20th time now you've asked that question.
7 THE WITNESS: And I said: No. I'm -- I
8 don't believe that we are in default.
9 BY MR. LONG:
10 **Q Okay. Great.**
11 **Of the Loan Agreement; correct?**
12 A Yes.
13 **Q Okay. And do you have personal knowledge**
14 **of any facts to support your position that -- that**
15 **Coldwater Development and Lydda LUD are not in**
16 **default of the Loan Agreement with Romspen?**
17 A I'm --
18 MR. BEKERIS: Objection. Objection.
19 Calls for a legal conclusion.
20 THE WITNESS: I'm not a lawyer, so I
21 can't give you this list of things that I believe
22 that -- why we are -- that I believe we are not in
23 default.
24 MR. BEKERIS: And objection to the extent
25 that it involves conversations with his lawyer, I

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1 would instruct him not to answer. Privileged
2 conversations with his lawyer.
3 BY MR. LONG:
4 **Q So is the basis of your understanding --**
5 **your belief that Coldwater Development and Lydda LUD**
6 **are not in default of the Loan Agreement with**
7 **Romspen, is that only information your lawyers have?**
8 A I --
9 MR. BEKERIS: To the extent that calls
10 for discussions he's had with his lawyers, I
11 would -- it's attorney-client privilege.
12 MR. LONG: Actually, it's a "yes" or "no"
13 question. I'm asking him --
14 MR. BEKERIS: To the extent it involves a
15 conversation with his lawyer, it's attorney-client
16 privilege.
17 BY MR. LONG:
18 **Q You can go ahead and answer, sir, other**
19 **than conversations you've had with your lawyer.**
20 MR. BEKERIS: To the -- yeah. To the
21 extent it doesn't involve a conversation with your
22 lawyer.
23 BY MR. LONG:
24 **Q Do you want me to ask the question again?**
25 A You can ask as much as you want. The

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1 answer will be the same.
2 **Q Okay. So is your only understanding**
3 **regarding the -- your position that Coldwater**
4 **Development and Lydda LUD are not in default of the**
5 **Loan Agreement, that's based on information your**
6 **lawyers have and not you; is that correct?**
7 MR. BEKERIS: To the extent that involves
8 conversations he had with his lawyer, I would -- I
9 would -- I would submit the attorney-client
10 privilege.
11 BY MR. LONG:
12 **Q You can go ahead and answer.**
13 A Same answer.
14 **Q What is it? I don't know what you mean**
15 **by -- the "same answer" is not -- I need an answer.**
16 A I gave you an answer.
17 MR. LONG: Okay. Can I have the question
18 read back?
19 THE WITNESS: Ask the reporter to,
20 please, read the past questions you have asked, and
21 you will -- give you the answers that I give.
22 MR. LONG: Sir, this is my deposition;
23 okay? I'm going to run it the way I want to do it,
24 because I have intended uses for this deposition
25 later on. So I want an answer to that question,

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1 please. You don't get to -- to run this deposition.
2 I do.
3 So can you answer my question?
4 THE WITNESS: No, you can't bully me
5 around. Let me explain to you something. We
6 believe that Romspen and other people have done --
7 they made sure that I am somehow in -- in default,
8 so we are -- we will object. I'm going to object to
9 it. I will not give you an answer to that. And I
10 will -- we will see you in court -- and I'm sure
11 very soon -- showing you and Romspen and whoever
12 bought the -- the -- the -- the loan from Romspen,
13 that they caused -- they caused this -- this --
14 caused my -- caused me to be in default.
15 So I don't believe I'm in default at this
16 time. And we will -- we can prove that.
17 BY MR. LONG:
18 **Q Okay. And are you willing -- can you**
19 **tell me any of the facts that support --**
20 A No.
21 **Q -- your position that you're not in**
22 **default?**
23 A No, sir.
24 **Q Okay. In connection with the loan from**
25 **Romspen -- actually, you know what? We've been**

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1 **going for an hour and a quarter. I want to give the**
2 **court reporter a break, because the court reporter's**
3 **hands get tired.**
4 A Okay.
5 **Q We'll take a 15-minute break, and we'll**
6 **come back.**
7 A Okay, sir. Take care.
8 THE VIDEO OPERATOR: Everyone agree?
9 MR. BEKERIS: Just a second.
10 What's the break schedule for today,
11 Counsel?
12 MR. LONG: I don't -- I don't have a
13 break schedule.
14 MR. BEKERIS: Okay. Well, could you come
15 up with one so we kinda get an idea when we're going
16 to be taking breaks? Is that possible?
17 MR. LONG: Let's go off the record and
18 have that discussion real quick; okay?
19 MR. BEKERIS: No. I don't want to go off
20 the record.
21 MR. LONG: Okay.
22 MR. BEKERIS: I want to stay on the
23 record and have that discussion.
24 MR. LONG: Okay.
25 So I want to take a 10-minute break now

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<p>1 to give the court reporter a break. Then I say we 2 go back for another hour. And then we can break for 3 lunch, like around 12:30. And then we'll come back, 4 and we'll resume after lunch. 5 MR. BEKERIS: What time do we come back 6 after lunch? 7 MR. LONG: It depends on what time we 8 break for lunch. 9 MR. BEKERIS: Okay. So I would say an 10 hour and a half for lunch? 11 MR. LONG: If that's what you need -- if 12 that's what you need, I'm -- I'm fine. 13 THE WITNESS: Okay, sir. 14 MR. BEKERIS: Okay. I have to finish by 15 5:00 today. So if you can't get done by 5:00 today, 16 I don't want to take any breaks. I want to get 17 done. 18 MR. LONG: Well, I -- I -- I'm going to 19 take the deposition -- I'm going to give the court 20 reporter a break. I'm going to take a lunch break, 21 which is normal. And we'll see how much we get done 22 in the afternoon. 23 THE WITNESS: You take as long as you 24 like. Let's not get overreaction for how long is 25 the lunch and so on. I'll continue. Take a break.</p>	<p>1 Q Okay. 2 MR. BEKERIS: I'm going to make an 3 objection. I waited for the objection, because I 4 wanted to give him a chance to give you an answer 5 first. 6 I'm going to request that you stop asking 7 him if he's in default of that. You've asked him 20 8 times now. So if you could stop asking that 9 question, that would be appreciated. 10 MR. LONG: Okay. Counsel, and I want to 11 meet and confer on this. This is the first time 12 I've asked him about his Guarantee Agreement. I 13 asked previously about the Promissory Note, by the 14 two borrowers with Romspen. I asked about the Loan 15 Agreement by the two borrowers of Romspen. This is 16 the first question I've even asked about his 17 Guarantee Agreement. 18 MR. BEKERIS: Well, I would -- I would 19 beg to differ with you, because the contract in all 20 of its parts form basically the same contract. So 21 if he's -- if he's not in default on one, he's not 22 in default on any part. And I think it's 23 repetitive. You've done it 20 times now. You 24 can -- you can, maybe, look at the law -- you 25 know -- and -- and try to parse parts of it out, but</p>
<p>1 I'll see you guys in 15 minutes. 2 MR. LONG: Okay. Let's do a 10-minute 3 break. 11:25. 4 THE VIDEO OPERATOR: Do you agree, 5 Mr. Bekeris? 6 MR. BEKERIS: Okay. I agree. Let's go 7 off the record. 8 THE WITNESS: That's fine. 9 THE VIDEO OPERATOR: We are off the 10 record at 11:16 A.M. 11 (Off the record) 12 THE VIDEO OPERATOR: We are back on the 13 record at 11:28 A.M. 14 BY MR. LONG: 15 Q Mr. Hadid, are you okay to continue? 16 A Yes, sir. 17 Q Okay. In connection with the loan by 18 Romspen to Coldwater Development and Lydda LUD, you 19 entered into a written Guarantee Agreement; is that 20 correct? 21 A Yes, sir. I believe so. Yes, sir. 22 Q And is it your position that you are not 23 in default of your Guarantee Agreement? 24 A I believe -- as of today, I believe that 25 I -- I have a reason to believe that I am not.</p>	<p>1 I -- I -- I -- I would -- I'm -- I'm going to 2 object. It's a -- asked and answered. It's -- it's 3 becoming repetitive. And I'm going to ask you to 4 please limit your questions along those lines, and 5 let's move on. 6 MR. LONG: Oh, well, I'm not going to do 7 that. I'm going to take the deposition as I see fit 8 to take the deposition. I disagree with your legal 9 analysis. These are separate contracts. They do 10 relate, but they're separate contracts. So I'm 11 going to take my deposition how I want to take it, 12 and -- you know -- that's how it's going to happen. 13 BY MR. LONG: 14 Q So, sir -- 15 MR. LONG: Can I have my last question 16 read -- read back so I can remember where I'm at, 17 court reporter? 18 THE CERTIFIED STENOGRAPHER: Yes. 19 (Record read by the Certified 20 Stenographer as follows:) 21 "QUESTION: And is it your 22 position that you are not in 23 default of your Guarantee 24 Agreement?" 25 MR. BEKERIS: Let me ask you a question,</p>

1 Counsel --
2 MR. LONG: Can I have the answer, please.
3 MR. BEKERIS: No. First, I want to ask
4 you a question, based on what you just said. Are
5 you telling me these three documents don't form one
6 contract? Is that what you're saying?
7 MR. LONG: Counsel, I'm not having this.
8 This is my deposition.
9 MR. BEKERIS: Well, you just made a
10 statement. You said they're three different
11 contracts. Are -- that's what your legal position
12 is, and I just want to clarify that so -- so I can
13 understand this. Like you say, I'm a two-year
14 attorney. I've got to learn from -- from you, I
15 guess. I don't know. I just -- I just want to
16 understand your position. Are these three separate
17 contracts?
18 MR. LONG: It's not my job to teach you
19 the law of contracts, Counsel.
20 So, Court Reporter, can I have the answer
21 to my question read, please.
22 (Record read by the Certified
23 Stenographer as follows:)
24 "ANSWER: I believe -- as
25 of today, I believe that I -- I

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1 have a reason to believe that I
2 am not."
3 MR. LONG: Okay.
4 BY MR. LONG:
5 Q And, sir, are you -- can you share with
6 me any of the -- any of the facts supporting your
7 reason to believe that you are not in default of
8 your Guarantee Agreement of the loan by -- by
9 Coldwater Development and Lydda LUD and Romspen?
10 A I have -- sir, I will answer that
11 question which you asked me within the other. I
12 understand it's hard to break 'em up, so we have
13 different answer. But as I said, the -- the whole
14 agreement -- the whole agreement between Romspen and
15 Coldwater and I personally, all -- I believe -- are
16 not in default.
17 They were not in default when -- when --
18 when Give Back approached them. All I'm saying --
19 that's the case -- they were not in default when --
20 when Give Back approached to buy or whatever these
21 agreements and the personal guarantees. No.
22 Q Okay. And my question to you is: Do you
23 have personal knowledge of any facts supporting your
24 position that you are not in default of your
25 Guarantee Agreement?

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1 A I got it. What I said to you earlier, as
2 well, is that my -- my legal team, who is different
3 than this gentleman or -- are working diligently to
4 answer these questions. And while we believe that
5 this -- this agreement is still not in default -- it
6 was not in default when Give Back offered them more
7 money than what it's worth. That's the reason
8 I'm -- I am -- I'm answering this, because we
9 believe that it was not in default at the time,
10 because we had reasons at the time why we believe it
11 was not. And, therefore, still that -- these
12 reasons, still here, and my -- my legal team, and
13 I'm not here to give you a third opinion what they
14 think, because that's not my -- that's not my job.
15 I don't know much. I don't really read
16 these things as much as you people and most people
17 do. So I have a qualified team that understand
18 the -- these documents, and they are -- you will get
19 an answer to all of these very soon, sir.
20 Q And I -- I don't want to know about your
21 lawyers told you or what your lawyers believe. But
22 putting aside what you have learned from your
23 lawyers, can you tell me any of the reasons why you
24 think that you are not in default of your Guarantee
25 Agreement?

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1 A I can't tell you.
2 Thank you for --
3 Q Go ahead.
4 A But thank you for the question.
5 Q You're welcome. I'm just doing my job,
6 sir.
7 A Yes.
8 I want to say something. You're doing
9 amazing job. You're -- you are an attorney for
10 others, and I understand that. And I'm here just to
11 give you answers as -- as -- as honest -- I would
12 like to give you more information, but I believe
13 it's not proper for me to give you this information
14 at this moment, because we are -- we are still in a
15 lawsuit, and we are -- we, hopefully, go back and
16 forth, and we'll -- as you know, there was a --
17 there's also the bankruptcy situation that we are
18 working on. And, hopefully, this will -- all this
19 will -- will be under the water -- under the bridge
20 soon. And we -- I'll pay back Give Back, and we
21 will walk away with a handshake and move on. That's
22 it.
23 Q Sure.
24 And I just want you to understand,
25 because you said: We're in a lawsuit.

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1 **And the purpose of this deposition is so**
2 **I can discover what information and facts you have.**
3 **So, again, I want to be perfectly up front with you**
4 **that if later on in opposition to our**
5 **summary-judgment motion there's a Declaration from**
6 **you personally, and you didn't share those facts**
7 **with me today, we're going to object and move to**
8 **strike. I'm just -- I want to be perfectly up front**
9 **with you.**
10 **Let's move on.**
11 A Well, between now and then, we'll see
12 what we can -- we can -- we can -- you know -- I
13 can't give you the answer. We have -- we still --
14 as I said, we have a legal team that's working on
15 the numbers and working on the -- on the -- as you
16 said, the agreements and the -- and the personal
17 guarantees and so on and so forth. Until then, I
18 can't give you that answer. We're working on it.
19 And, hopefully, between now and then, the Give Back
20 gets their -- what they paid for and whatever else
21 they asked for. And we'll move on.
22 As I said, it's -- now we're taking care
23 of the taxes. We'll make sure that you guys don't
24 have to fork out taxes that was my responsibility or
25 the responsibility of Coldwater and Lydda LUD. So

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1 I'm trying to -- I'm trying to make it easy for
2 everyone, that we can come to a conclusion with this
3 whole problem faster than -- than you think.
4 **Q Okay, sir, I just want to confirm -- I**
5 **want to go back to some of the asset questions I was**
6 **asking before.**
7 **You do not have a checking account in the**
8 **State of California; is that correct?**
9 A I do not, no.
10 **Q And you do not have a checking account**
11 **anywhere in the United States; is that correct?**
12 A No, sir.
13 **Q You do not have a savings account in**
14 **California; is that correct?**
15 A No, sir.
16 **Q You do not have a savings account**
17 **anywhere in the United States; is that correct?**
18 A That's correct.
19 **Q Okay. You don't have any form of deposit**
20 **account anywhere in the United States; is that**
21 **correct?**
22 A That's correct.
23 **Q Okay. Do you personally own -- I'm**
24 **sorry. Did somebody say something?**
25 A No. Something came up on the phone.

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1 Go ahead.
2 **Q Do you personally own any real property**
3 **in California?**
4 A No, sir. None at all. Not a single --
5 not a single personal interest in any property in --
6 in California.
7 **Q Okay.**
8 A Or U.S.
9 **Q You said, "property." I just want to**
10 **make sure I'm talking about real estate.**
11 A Real property, yeah. Real property.
12 Real estate property, yes.
13 **Q Okay. And you just said: United States**
14 **-- but I'm going to ask the question so I have a**
15 **question and answer.**
16 **Do you personally own any real property**
17 **anywhere in the United States?**
18 A No, sir.
19 **Q Do you have any money market accounts**
20 **anywhere in the United States?**
21 A No, sir.
22 **Q Do you have a safety deposit box anywhere**
23 **in the United States?**
24 A No, sir.
25 **Q Do you have a safe anywhere in the United**

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1 **States?**
2 A No, sir.
3 **Q Do you have any stock investment accounts**
4 **anywhere in the United States?**
5 A No, sir.
6 **Q Do you have any securities accounts**
7 **anywhere in the United States?**
8 A No, sir.
9 **Q Do you own any stocks of any United**
10 **States corporations --**
11 A No, sir.
12 **Q -- personally?**
13 A No, sir.
14 **Q Do you personally own any bonds?**
15 A No, sir.
16 **Q Do you personally have any -- actually,**
17 **strike that.**
18 **Do you own any precious metals in the**
19 **United States?**
20 A No, sir.
21 **Q I know it might seem funny, but some**
22 **people have gold in their safes. So --**
23 A Yeah. I have gold underground.
24 I do not. No. It was a joke, by the
25 way.

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<p>1 Q I understand that. And thank you for 2 clarifying it. 3 Do you have any certificates of deposit 4 in the United States? 5 A No, sir. 6 Q Do you have any loans that are owed to 7 you by anyone in the United States? 8 A Owed to me by -- just friends from 9 last -- last 30 years I lent money to. I don't 10 think anybody's paying me back. 11 Not really. I mean, they're not -- you 12 know, they're personal loans that I don't even think 13 that, you know, I'll ever get them. So -- 14 Q Well, for any of those personal loans, is 15 there any written Loan Agreement or documentation? 16 A No. That's what I was trying to tell 17 you. None of them are. 18 Q What is the highest amount of any of 19 those personal loans? 20 A Probably \$150,000. 21 Q Okay. Can you tell me who owes you 22 \$150,000? 23 A A gentleman -- well, I -- want me to give 24 you a name? 25 Q Yes.</p>	<p>1 story. But you did -- you did, sort of, ask him to 2 guess what the amount of the loan was. So it 3 sounded to me like speculation, as I would object to 4 the question. Calls for speculation. 5 THE WITNESS: What I'm trying to say to 6 you, and I'm -- in a nicer way, sir. And I know 7 that's probably not the proper way to say these 8 things. But I have forgiven these loans, and I 9 don't expect them back. So it's not like I am -- I 10 am -- I'm going to go after someone. I want to go 11 after someone, I would have sued them, or I asked 12 them for it. And none of these people have the 13 ability to pay me. Otherwise, they would pay me. 14 So I am just saying to you, I have 15 forgiven them. So I don't believe that they owe me. 16 Therefore, I've moved on with my life. For you to 17 act as if I am pursuing them, I'm not. 18 So they are -- I'm sure you have friends 19 that you have lent money to that you decided that 20 you don't pursue them. And I'm tell you right now 21 that I don't pursue them, and I don't want anybody 22 else pursuing them. 23 So if you -- if you can get an order from 24 the judge saying that I have to tell somebody about 25 some -- you know, I mean, I -- I would have hired</p>
<p>1 (Witness's video turned off) 2 THE WITNESS: Somebody's -- okay. Sorry. 3 I'm back. 4 I -- I'm going to -- I'm going to -- I 5 think that's, you know, really -- I think that's 6 private. And I -- I -- it's not written. It's 7 not -- you know, I don't -- I don't -- I -- I -- I'm 8 not going to -- I'm not going to tell. I can't say 9 the name. That's really a friendly gesture that I 10 did. And I'm not going to have somebody being -- 11 somebody harassed about \$150,000. 12 BY MR. LONG: 13 Q Okay. And I understand what you're 14 saying. But I just want you to know that we have 15 the legal right to the information. This individual 16 is an account debtor and obligor of yours -- an 17 obligee and owes you money. So we have a right to 18 that information pursuant to the Writ of Attachment 19 of discovery. So I just want to let you know that. 20 So are you refusing to provide me with 21 any of the names of any of the individuals that owe 22 you money? 23 MR. BEKERIS: Before we do that, I'd like 24 to put in an objection. I just let it go, because I 25 don't -- I -- I want you to get a true and correct</p>	<p>1 a -- you know, a collecting agency to do that. I'm 2 not -- I am not going to make you as a collecting 3 agency for me to pay Give Back. Give Back supposed 4 to be -- by the way, isn't it like give back to 5 people instead of taking back from people? 6 But that's okay. 7 I'm just telling you that's not my style, 8 and I have already forgiven them, forget, forgive -- 9 forgive and forgave and forgot these loans. So 10 that's why I'm reluctant to give you a name. 11 BY MR. LONG: 12 Q Okay. And that's fair enough. And I 13 appreciate your response, and I understand what 14 you're saying. I think that's -- that's all fine. 15 I just -- 16 A I -- 17 Q Let me finish, please. 18 I just want to make my record. All I'm 19 asking is because of the reasons you just said, you 20 don't want to share with me any of the names of the 21 individuals who you may have lent money to? 22 A Yes. I just -- I don't -- I believe 23 forgave them. Like when you forgive someone, you 24 don't give it -- you don't give it to someone else 25 to collect -- it's not -- it's forgiven. It means</p>

1 they don't owe it to me anymore.
2 **Q I understand. I understand.**
3 A Thank you very much.
4 **Q Okay. Do you have any accounts**
5 **receivable that are personally owed to you in the**
6 **United States?**
7 A No, sir.
8 **Q Do you personally own any licenses in the**
9 **United States? And there's different -- to be**
10 **clear, I don't want to be -- I'm not talking about,**
11 **like, a driver's license but a license to sell a**
12 **product or anything like that. Do you personally**
13 **own any licenses?**
14 A License to -- I'm -- I'm sorry. I don't
15 know -- like, license -- what? A firearm license?
16 **Q Forget it. We'll move on.**
17 **Do you have any -- do you own any**
18 **copyrights in the United States?**
19 A I did when I was 16 years old for a
20 product. And then I sold -- I sold it to my
21 teacher. That's the only one I have.
22 **Q Okay.**
23 A Clap on, clap off; clap on and clap off.
24 **Q Really?**
25 A Yeah.

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1 **Q Do you own any trademarks in the United**
2 **States?**
3 A Trademarks -- I don't know -- I don't
4 know you mean about trademarks. No. No, I don't.
5 **Q Do you hold any patents in the United**
6 **States?**
7 A No, sir.
8 **Q Are you the beneficiary of any trusts?**
9 A No, sir.
10 **Q Are you the trustor of any trusts?**
11 A No, sir. I'm a very simple guy. Much
12 more than you think.
13 **Q Well, let me ask you that: How many LLCs**
14 **are you a member of?**
15 A I don't know, because they're -- as in
16 our -- in the business of development, you always
17 put most of the projects in the past and even now in
18 LLCs -- because they are eventually sold. It's not
19 like when I had my own personal home it was in my
20 name. But all the other projects we have done in
21 the past are always LLCs. It's a -- it's a -- all
22 the developers do that: LLCs or corporation or
23 partnerships.
24 So they are -- so I can't -- I can't
25 really tell you how many we have.

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1 At one time, I probably had -- when I
2 was -- when I had my projects in Washington, D.C.,
3 and Aspen, Colorado, and other places, we
4 had probably hundreds of LLCs. That's the way
5 business was done.
6 So right now, you know, probably -- you
7 know, five, or six, or seven LLCs.
8 **Q Can you identify for me all the LLCs that**
9 **you are a member of.**
10 A No, sir, I can't. I can -- I -- I
11 probably gave you already half of them or three of
12 them. There's the Lydda LUD and Coldwater and Tree
13 Top and Tree Lane. That's pretty much -- I really
14 don't -- I don't know -- some of them are expired.
15 Some are still live. I'm not sure.
16 **Q Other than the four LLCs that you just**
17 **listed, are there any others that you are currently**
18 **a member of that you can think of right now?**
19 A At this moment, I can't think of. But,
20 hopefully, I will provide you -- provide you with
21 that when I do.
22 **Q Where do you keep your documents**
23 **regarding these LLC memberships, Operating**
24 **Agreements, and so forth?**
25 A All my own -- all my books and records

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1 now in my office in Cairo.
2 **Q Okay. Other than the LLCs you just**
3 **listed, are there any corporations that you are a**
4 **shareholder of?**
5 A No, sir.
6 **Q No corp -- you are not a shareholder of**
7 **any corporation?**
8 A No, sir.
9 **Q Okay. And when I ask that, I'm asking --**
10 **just to be clear -- broadly, whether it's a public**
11 **corporation or a private corporation.**
12 **You have no shares in any public or**
13 **private corporation. Is what you're telling me?**
14 A At this time, no.
15 **Q Okay. And you understand the distinction**
16 **between a private and a public corporation?**
17 A Yeah.
18 **Q Okay. By "public," I mean, a publicly**
19 **traded -- like Apple, for example. You don't have**
20 **any Apple shares?**
21 A Well, if I had Apple shares, I wouldn't
22 be sitting here with you.
23 **Q Well, depends on how many you had.**
24 A Right. I'm just joking with -- we
25 wouldn't be in this place right now if that's the

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1 case. If you asked me that question a year ago or
2 two years ago, I'd say, "Yes." But I've -- a lot of
3 these stocks and so on were depleted in the Strada
4 Vecchia case -- Strada Vecchia projects, as you
5 know. I'm sure you're aware of it.
6 **Q Are you a partner in any limited or**
7 **general partnerships?**
8 A No, sir.
9 **Q Just so you understand, I have notes.**
10 **I'm scrolling through my notes to try and speed**
11 **things up.**
12 A Take your time, sir. Take your time.
13 I'm not -- I'm not in a hurry. And I would like to
14 have this finished, and, hopefully, we'll --
15 we'll -- we'll come to a -- an amicable resolution
16 eventually.
17 **Q Do you own any personal property in**
18 **California?**
19 A I think you just asked me that question,
20 maybe?
21 **Q Well, personal property is different --**
22 A Oh, no, no.
23 MR. BEKERIS: I just mentioned to my
24 client, I don't think he's been asked about personal
25 property.

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1 THE WITNESS: Well, personal property as
2 estate or -- what -- like, talking about what?
3 BY MR. LONG:
4 **Q Well, personal property can be something**
5 **physical and tangible, like furniture or**
6 **automobiles. It can also be --**
7 A No.
8 **Q It can also be --**
9 (Certified stenographer interruption)
10 BY MR. LONG:
11 **Q There's also intangible personal**
12 **property.**
13 **So to be more specific, do you own any**
14 **tangible personal property in California?**
15 A Truthfully, I really don't understand
16 that -- the meaning of "tangible." I mean, I
17 don't -- I don't understand that.
18 **Q Fair enough. I can appreciate that.**
19 **So when I say, "tangible," I mean**
20 **automobiles, furniture, works of art -- anything**
21 **like that -- in California?**
22 A No, sir.
23 **Q Okay. Do you own any tangible personal**
24 **property anywhere in the United States?**
25 A I do not.

82

1 **Q Okay. Do you have, like, a storage unit**
2 **anywhere in the United States that you store stuff**
3 **at?**
4 A We have a storage unit -- I'm not sure if
5 it's still there -- that was storing some --
6 something owned by not myself, if that's what you're
7 asking. It's -- we have a storage unit, but there's
8 nothing of my personal property there. It's mostly
9 owned by -- by the Cedar Brook -- Cedar Brook -- you
10 know, just like when you pre-buy things for a -- for
11 a project, you store 'em there. So I'm not sure
12 exactly -- if you're asking me, me personally? I do
13 not have storage area, no.
14 **Q Okay. Thank you.**
15 **I have a question for you about the**
16 **entity Lydda LUD. What does that name -- did you**
17 **pick that name?**
18 A No, I did not, actually.
19 **Q Okay. Do you know what the name**
20 **represents? I mean, I understand Coldwater**
21 **Development, but do you know why it was named Lydda**
22 **LUD?**
23 A I guess -- no, I don't. Somebody's -- my
24 understanding, it was somebody's street name or
25 something.

83

1 Truthfully, no.
2 Do you know?
3 **Q I don't know.**
4 A I don't know. I truthfully don't know.
5 **Q Do you know an entity by the name of "AM**
6 **Family Fund, LLC"; correct?**
7 A Yes.
8 **Q And you are the sole member of AM Family**
9 **Fund, LLC?**
10 A Yes, sir.
11 **Q What does that name mean, AM Family Fund,**
12 **LLC?**
13 A It does not have any -- what do you mean,
14 what's the meaning of? Like, what's the initials?
15 **Q Correct. If there is one.**
16 A Yeah, I don't think -- I -- you know, I'm
17 not saying I'm -- I'm going to become senile now
18 that I'm 72 years old, but I -- I don't even recall
19 why that was -- that name -- that -- these initials
20 were -- were -- well, somebody calling, so I'm just
21 decline it.
22 I don't recall why the name was created.
23 **Q And the reason I ask, I just wanted to**
24 **know if it was someone's initials.**
25 A No.

84

1 Q We can move on. It's not important.
2 A Yeah. I don't remember.
3 Q Are you a plaintiff in any lawsuit
4 currently?
5 A Am I a plaintiff in any lawsuit? No.
6 Q Do you have any money judgments where you
7 are the judgment creditor?
8 A No, sir.
9 I would hire you.
10 Q Well, we'd have a conflict, but thank
11 you. And I know you're kidding.
12 A Can you turn off the --
13 MR. BEKERIS: I cannot, because --
14 THE WITNESS: But turn off the music --
15 MR. BEKERIS: I tried. I tried.
16 BY MR. LONG:
17 Q Sir, do you own any motorcycles?
18 A No.
19 Q Do you own any boats?
20 A No.
21 Q Any airplanes?
22 A Sold mine. I had three. I sold the last
23 one, I think, two years ago.
24 Q What kind of airplane was that?
25 A It was a 727.

85

1 Q Did you own that personally or through
2 one of your entities?
3 A It was an entity.
4 Q Which entity owned the airplane?
5 A God. It was an entity that was owned
6 originally by the person who owned it. And usually
7 you keep it because the -- the aircraft -- the --
8 the LLC goes with the aircraft and continues to keep
9 the -- to keep the "N" number on. So I'm trying to
10 remember what's the name of it.
11 I think the -- it was -- it was owned --
12 I think it was owned by a company named "Tampa
13 Design." Yeah. I think Tampa Design.
14 Q And were you an owner or a part owner of
15 Tampa Design?
16 A No.
17 Q Tampa Design owned the airplane, you
18 think?
19 A Yeah. I think Tampa Design -- yes. I
20 think it did own the airplane. I bought -- another
21 company owned -- another company bought it from them
22 and operated it for a few years. And it just sat
23 at -- for awhile at -- at Signature Aviation. And
24 then -- it did not actually move for seven years.
25 Then it was sold for zero dollar.

86

1 Q Where is Signature Aviation?
2 A It was -- it was in Van Nuys.
3 Q Do you have any -- any property that you
4 rent or lease in Colorado?
5 A Colorado?
6 Q Correct.
7 A No, sir. No. I used to own a lot of
8 stuff in Aspen, Colorado, at one time. But at this
9 time, I don't have anything.
10 Q That airplane that was sold, did you
11 receive any of the proceeds from the sale?
12 A Zero. I paid to get it out. You
13 couldn't give it away.
14 Q Do you own any jewelry in the United
15 States?
16 A I don't.
17 Q Do you have an accountant that you use in
18 the United States?
19 A I really -- yes. I don't know -- I don't
20 even know the name from talk to them. So I -- I do,
21 yeah.
22 Q But you don't know the name of your
23 accountant in the U.S.?
24 A I -- I really don't. I really don't.
25 No, I don't.

87

1 Q If you don't talk to that accountant, who
2 talks to them on your behalf?
3 A A lot of times, my office in Cairo, they
4 talk to them. My -- my old assistant has talked to
5 them. I don't really -- I -- I never -- I don't
6 have a conversation with them at all.
7 Q What's the name of your old assistant
8 that you just mentioned?
9 A Marilyn Foster.
10 Q Can you spell that?
11 A Marilyn -- Marilyn, as in Marilyn.
12 Foster, F-o-s-t-e-r.
13 Q Is it Marilyn?
14 A Foster, yeah.
15 Q M-a-r-i-l-y-n?
16 A Yes.
17 Q Do you know where Ms. Foster lives? In
18 Los Angeles?
19 A She is back -- now she's in Cairo.
20 Q She's still your assistant?
21 A Yes.
22 Q Do you know if Marilyn Foster is a United
23 States citizen?
24 A Yes. She is.
25 Q Are you a United States citizen?

88

1 A I am. I am. I am for almost -- almost
2 6-- 58 years.
3 Q When was the last time that you filed a
4 United States tax return?
5 A Probably -- I want to say last year.
6 Q What is the name of your tax preparer?
7 A I don't -- I don't know. I don't get --
8 as I said to you again, I don't really get involved
9 in any of this stuff.
10 Q Who would know the name of your tax
11 preparer?
12 A I can get it to you.
13 Q Okay. Let's leave a blank right here.
14 And then if you can insert the name of your tax
15 preparer.
16 (INFORMATION REQUESTED:
17 _____
18 _____
19 _____
20 _____
21 _____)
22 BY MR. LONG:
23 Q Did you file any state income tax returns
24 in the United States?
25 A I believe -- I believe we did, yeah.

89

1 Q For what state?
2 A California only.
3 Q When was the last time you filed a
4 California income tax return?
5 A I want to say last year. The same time
6 everybody else does.
7 Q And was that a personal tax return?
8 A I believe that they filed tax return for
9 me. There's not much there to file. Yeah.
10 Q Do you know what income you reported on
11 your California income tax return that was last
12 filed?
13 A I think zero.
14 Q Do you know what the gross income was
15 reported on your last California income tax return?
16 A No, sir.
17 Q Do you utilize any bookkeepers here in
18 California?
19 A No.
20 Q Do you intend to file a California State
21 income tax return for 2020?
22 A I think they have changed it from April
23 to June or something.
24 Yes. We will. Just, I think it has been
25 delayed because of COVID.

90

1 Q Do you have any knowledge sitting here
2 today as to what -- or can you give me an estimate
3 as to what your gross income for California was for
4 2020?
5 A I would say zero.
6 Q You had zero gross income?
7 A Yeah.
8 Q And you're still going to file a
9 California income tax return?
10 A Yup.
11 Q What is your current net worth?
12 A I don't have a -- I don't even think
13 there is a number in my head what my gross net
14 worth -- I -- I can't tell you. I really can't tell
15 you. I don't know. It's what -- whatever I have
16 equity in -- and/or value in my properties and --
17 and -- and the -- the debt on 'em and so on so
18 forth. I really don't know. I don't get involved
19 in these kind of things. I don't posture on what my
20 net worth -- minus or plus.
21 Q I understand that. And I'm not -- I'm
22 not asking you to posture on it. I just wanted to
23 know if you are able to give us an estimate here
24 today as to your net worth. That's all.
25 A I really can't tell you, sir.

91

1 Q Okay. When was the last time you
2 prepared a personal financial statement or someone
3 prepared one on your behalf?
4 A I think the last one was maybe five years
5 ago -- five, six years ago. Five years ago when --
6 I think probably five -- four or five years ago.
7 Since then, things have changed a lot. I'm sure you
8 know.
9 Q Do you know who prepared the -- your
10 personal financial -- your last personal financial
11 statement?
12 A No, I don't.
13 Q Do you still have a copy of it?
14 A I don't.
15 Do you mind for a minute? I'm just going
16 to put drops in my eyes. I'm not as young as you
17 guys are. I have to -- once in a while, they dry
18 up.
19 Go ahead.
20 Q Yeah. Just a second.
21 Within the last year, have you personally
22 applied for any loans?
23 A No. Not that I recall, no.
24 Q Within the past year, have you obtained
25 any loan commitments from any lenders?

92

1 A To me personally or to -- to me
2 personally?
3 **Q Correct. To you personally.**
4 A No.
5 MR. LONG: Okay. Counsel, I'm going to
6 suggest we take a short break. I may have -- I may
7 be able to wrap it up before lunch, and we can all
8 be outta here early. Let's take, I suggest, a
9 10-minute break, and we can come back?
10 THE WITNESS: Thank you, sir. Appreciate
11 it very much.
12 THE VIDEO OPERATOR: Would that be fine,
13 Counsel?
14 MR. BEKERIS: Go off the record for 10
15 minutes. That's fine.
16 MR. LONG: Okay. We'll be back at 12:25.
17 THE VIDEO OPERATOR: We are off the
18 record at 12:13 P.M.
19 (Off the record)
20 THE VIDEO OPERATOR: We are back on the
21 record at 12:26 P.M.
22 BY MR. LONG:
23 **Q Mr. Hadid, what's your date of birth?**
24 A 11-6-1948.
25 **Q If someone needs to mail you something in**

93

1 if you have anything, you have Mr. Larry -- Larry --
2 Mr. Bekeris and -- and --
3 **Q Who's Larry?**
4 A Larry Rothstein.
5 **Q Right. Who was, I think, your original**
6 **lawyer in this litigation.**
7 A He's still on the case.
8 (Certified stenographer clarification)
9 MR. LONG: No, it's -- it's Larry
10 Rothstein.
11 BY MR. LONG:
12 **Q Mr. Hadid, in the last year, has**
13 **Coldwater Development, LLC, applied for any loans?**
14 A Have they applied for any loans? Yes.
15 **Q To which lenders?**
16 A I can't reveal these names, but -- I want
17 to say three, four -- three, four lenders. And
18 one -- and two personal lenders. Or personal
19 friends.
20 **Q And you -- you will not disclose -- I**
21 **just want to make sure this is clear on the record:**
22 **You will not disclose the names of any of the**
23 **commercial lenders that Coldwater Development has**
24 **applied to; is that correct?**
25 A That's correct, yes.

95

1 **California, what address do you give them? What's**
2 **your mailing address in California?**
3 A The Olympic Avenue one.
4 **Q I just want to confirm, it's 11301**
5 **Olympic Boulevard, Suite 537, Los Angeles,**
6 **California 90064?**
7 A Yeah.
8 I just want to tell you. It says,
9 "Suite." It's not really a suite. It's -- they
10 call that "suite," but it's suite as in a box.
11 **Q I understand that. But the address,**
12 **though --**
13 A Yes.
14 **Q Okay. You use "suite," even though it's**
15 **not an office suite?**
16 A I don't -- I never use "suite." Just,
17 you know, whatever. It's not called "Suite."
18 **Q Like, number 357 -- 537?**
19 A Yes.
20 **Q I'm just reading from what's on the**
21 **Secretary of State's website. I understand what**
22 **you're telling me.**
23 A Yeah.
24 **Q Okay.**
25 A And also through my lawyer, as I'm sure

94

1 **Q And you will not tell us the names of any**
2 **of the personal friends that Coldwater Development**
3 **has applied to for loans; correct?**
4 A Yes, sir. I will not.
5 **Q Has Coldwater Development obtained any**
6 **loan commitments from any commercial lenders or**
7 **private lenders?**
8 A We have -- well, commitments.
9 Commitments, we have two Letters of Intent. We have
10 one -- I would say as far as commitment, but it's
11 pretty close to -- it says: A commitment.
12 And, also, we have a -- a -- we have a
13 commitment from a personal lender for a -- for
14 the -- to pay the loan off. Yes.
15 **Q Can you tell me who the LOIs are from?**
16 A No.
17 **Q So you're refusing to disclose who the**
18 **LOIs are from; is that correct?**
19 A Yes, sir.
20 **Q Will you disclose who the -- the other**
21 **lender who you're close to a commitment from? Will**
22 **you disclose the identity of that lender?**
23 A No, sir. But they will disclose it in
24 the -- we've disclosed some already in the
25 bankruptcy court.

96

<p>1 Q Will you disclose the identity of the 2 personal lender? 3 A No, sir. 4 Q What is the amount of the two LOI -- each 5 of the LOIs, separately? 6 A Well, it's a combination of two. It's a 7 combination of a payoff to Give Back, an interest 8 reserve, and a -- a -- a -- other funds to continue 9 the permit for the road and the utilities and -- 10 that are in the city at this time. And also to -- 11 you know, just service -- service the debt and 12 service the tax and all that. You know, they will 13 hold back some of this stuff for taxation for 14 utilities for, you know, ongoing developments. 15 Q Can you tell me the dollar amount of 16 either of the LOIs? 17 A No, sir. 18 Q Do you know the amount and you're 19 refusing to disclose it, or you do not know the 20 amount? 21 A We are working on the amount. I can't 22 disclose what -- what's the amount. We are working 23 on amount. 24 Q So is there -- let me ask you this: Has 25 there been an agreement in those LOIs as the amount</p> <p style="text-align: right;">97</p>	<p>1 A We're talking about the same. 2 Coldwater -- the way that you speak of Coldwater as 3 the two entities. 4 Q Okay. So all the information you gave is 5 for both Coldwater, LLC, and Lydda LUD, LLC? 6 A Yes. 7 Q Okay. 8 A As you know, also, I had -- I had an 9 offer at one time to sell part of -- of Coldwater 10 and -- and Lydda LUD to an individual -- to an 11 individual for -- before this happen. 12 Q Who was that individual? 13 A I don't -- I don't believe that should -- 14 I should be bringing his name up. Mr. Richards will 15 know why. I'm -- I take other people's privacy 16 serious. 17 MR. LONG: Okay. I don't have any other 18 questions at this time. I am going to reserve my 19 rights, if I have to move to compel regarding the -- 20 some of the questions I asked about -- defaults and 21 facts on those. But subject to that, I'm concluding 22 the deposition. 23 THE WITNESS: Mr. Long, thank you so much 24 for your day. 25 MR. LONG: Sure.</p> <p style="text-align: right;">99</p>
<p>1 of the loan? 2 A The amount of the loan is subject to the 3 final -- hopefully final -- agreement between -- 4 between myself and the -- and Give Back. 5 MR. BEKERIS: And I'm going to object to 6 the question as it calls for a legal conclusion. 7 BY MR. LONG: 8 Q Is there an amount -- regarding the 9 commitment from your personal lender, is there an 10 amount that's been committed to? 11 A Yes. 12 Q How much? 13 A I -- I can't disclose that, sir. 14 Q Now, I don't want to waste time -- 15 anyone's time. So the questions I was just asking 16 you, they started talking about Coldwater 17 Development, LLC. If I was to ask you about loans 18 to Lydda LUD, LLC, it's the coborrower; right? You 19 understand that? 20 A Yes. 21 Q Okay. 22 A No. It's for all -- for all. 23 Q The information you just gave would not 24 be any different if I asked the same questions about 25 Lydda LUD?</p> <p style="text-align: right;">98</p>	<p>1 Before we finish, though, the court 2 reporter -- do you want to explain the procedure for 3 review, correction, and signing to the witness? 4 THE CERTIFIED STENOGRAPHER: Are you 5 getting a copy of the transcript, Mr. Bekeris? 6 MR. BEKERIS: Yeah. We'll order a copy. 7 MR. LONG: We'll do it all per Code. 8 THE CERTIFIED STENOGRAPHER: Correct. 9 THE WITNESS: Okay. 10 THE VIDEO OPERATOR: Once we go off the 11 record, can everyone stay on for just a second? 12 THE WITNESS: Yeah. 13 THE VIDEO OPERATOR: This concludes the 14 deposition of Mohamed Hadid. We are off the record 15 at 12:38 P.M. 16 (Time noted: 12:38 P.M.) 17 18 * * * 19 20 21 22 23 24 25</p> <p style="text-align: right;">100</p>

1 DECLARATION UNDER PENALTY OF PERJURY
 2
 3 I, Mohamed Hadid, do hereby certify under
 4 penalty of perjury that I have read the foregoing
 5 transcript of the proceedings taken on April 2, 2021;
 6 that I have made such corrections as appear noted on the
 7 Errata Sheet, attached hereto, signed by me; that my
 8 testimony as contained herein, as corrected, is true and
 9 correct.
 10
 11 Dated this ____ day of _____, 20____, at
 12 _____, California.
 13
 14
 15
 16 _____
 17 Mohamed Hadid
 18
 19
 20
 21
 22
 23
 24
 25

1 STATE OF CALIFORNIA)
 2)
 3 COUNTY OF SAN DIEGO)
 4
 5 I, Harry A. Palter, a Certified Shorthand
 6 Reporter of the State of California, do hereby certify:
 7 That prior to being examined, the witness in
 8 the foregoing proceedings was by me duly sworn to
 9 testify to the truth, the whole truth, and nothing but
 10 the truth;
 11 That said proceedings were taken, remotely,
 12 before me at the time and place therein set forth and
 13 were taken down by me in shorthand and thereafter
 14 transcribed under my direction and supervision;
 15 I further certify that I am neither counsel
 16 for, nor related to, any party to said proceedings, nor
 17 in any way interested in the outcome thereof.
 18 In witness whereof, I have hereunto
 19 subscribed my name.
 20
 21 Dated this 9th day of April, 2021
 22
 23 *Harry A. Palter*
 24 _____
 25 HARRY ALAN PALTER
 CSR No. 7708

1 ERRATA SHEET
 2
 3 Page No. ____ Line No. ____
 4 Change: _____
 5 Reason for change: _____
 6 Page No. ____ Line No. ____
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 25 _____
 Mohamed Hadid Dated

